

FILED



United States District Court
Albuquerque, New Mexico

UNITED STATES DISTRICT COURT
for the
District of New Mexico

United States of America)
v.)
LUIS ANTONIO TRUJILLO) Case No. 24-53 MJ
(year of birth 1980))
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 5, 2023 in the county of McKinley in the
District of New Mexico, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 875(c)	Interstate Communications

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

Complainant's signature

BI Special Agent James Ridder

Printed name and title

Telephonically sworn and electronically signed.

Date: 01/13/2024

City and state: Albuquerque, New Mexico

Hon. Kirtan Khalsa, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT

I, James Ridder, being duly sworn, state as follows:

1. This affidavit is made in support of a Criminal Complaint for LUIS ANTONIO TRUJILLO, (hereinafter referred to as TRUJILLO), year of birth 1980.
2. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since January 2016. I am currently assigned to the Albuquerque Field Office, Gallup Resident Agency. My primary duties as a Special Agent with the FBI include investigating crimes occurring in Indian Country. I have gained experience in the conduct of such investigations through previous case investigations, formal training, and in consultation with law enforcement partners in local, state, tribal, and federal law enforcement agencies. As a Federal Agent, I am authorized to investigate violations of the laws of the United States and have authority to execute criminal complaints and search warrants issued under the authority of the United States.
3. This affidavit is based upon my personal investigation at the scene, as well as information reported to me by other federal, state, tribal, and local law enforcement officers during the course of their official duties. Throughout this affidavit, reference will be made to law enforcement officers. Law enforcement officers are those federal, state, tribal, and local law enforcement officers who have directly participated in this investigation. This affidavit is also based upon information gained from interviews with cooperating citizen witnesses, whose reliability is established separately herein.
4. Based on my training, experience, and the facts set forth in this affidavit, I believe there is probable cause that violations of 18 U.S.C. § 875(c) – Interstate Communications, have been committed by TRUJILLO.
5. Because this affidavit is submitted for the limited purpose of securing authorization for the proposed warrant, I have not included each and every fact known to me concerning this investigation. This affidavit is intended to show that there is sufficient probable cause for the requested arrest warrant.

PROBABLE CAUSE

6. On January 12, 2024, the FBI Gallup Resident Agency, was contacted by Gallup Police Department (GPD) regarding text message threats sent by TRUJILLO to A.N., year of

birth 1974 (hereinafter referred to as VICTIM 1) and M.N., year of birth 1969 (hereinafter referred to as VICTIM 2) (hereinafter referred to collectively as VICTIMS). TRUJILLO is a relative of VICTIMS. VICTIMS are located in Gallup, New Mexico (NM).

7. Law enforcement knows TRUJILLO to have a violent criminal history, to include Murder, out of California. Law enforcement also knows that, upon release from prison, TRUJILLO stayed with M.T., year of birth 1952 (hereinafter referred to as WITNESS 1) at an address in Oceanside, California (CA). Law enforcement is also aware that TRUJILLO spent time during the Summer 2023 with VICTIMS at their property in Snowflake, Arizona (AZ).

8. VICTIMS provided screenshots of the text messages from TRUJILLO, which I reviewed. On December 5, 2023, TRUJILLO texted VICTIMS the following “I’m giving you guys one chance for throwing my shit away pay me back I don’t give a fuck any more pay me and I’ll call it even show this to the cops I don’t care but when I get out I’m going to burn every thing”.

9. A second text was sent by TRUJILLO to VICTIMS which stated: “Gas light up pretty good.” Law enforcement is working to determine the exact date of this transmission, but it was sent after the text where TRUJILLO threatened to “burn everything.”

10. Both of these texts, among others, were sent from 442-379-7597. VICTIMS confirmed to law enforcement investigators that this phone number belongs to TRUJILLO. Open-source research also confirmed that phone number 442-379-7597 was associated with TRUJILLO at an address in Oceanside, CA, where he reportedly resides with his mother.

11. The FBI also received information from law enforcement in Snowflake, AZ that on or about January 11, 2024, TRUJILLO got into a verbal altercation with WITNESS 1 in Oceanside, CA. During the verbal altercation, TRUJILLO made statements to WITNESS 1 that TRUJILLO would burn down VICTIMS’ businesses and homes. TRUJILLO also told WITNESS 1 he wanted to choke VICTIM 1 and watch VICTIM 1 die, and that he fantasized about choking VICTIM 1. These statements were passed to VICTIMS through family members and then to Snowflake, AZ law enforcement.

12. According to information provided to investigators on January 12, 2024, after the argument with WITNESS 1, TRUJILLO left the residence and drove east. Family members confirmed TRUJILLO’s vehicle bore California license plate 9CWM083. Law enforcement records verified the vehicle associated with this license plate to be registered to TRUJILLO.

13. On January 12, 2024, at approximately 1:40 pm, TRUJILLO's license plate was detected by a license plate reader system at the location at approximately 33.0722846, -112.065221 in Maricopa, AZ. I know this location to be approximately 190 miles from 488 S. Frontier Parkway in Snowflake, AZ.

14. At approximately 8:00 pm on January 12, 2024, law enforcement and emergency fire services in Snowflake, AZ were alerted to a residential fire located at a property belonging to VICTIMS' in Snowflake, AZ. Local law enforcement investigators are in the initial stages of their arson investigation. Based on information known to law enforcement at this time, TRUJILLO is the primary suspect of the investigation.

15. On or about January 12, 2024, additional information provided to investigators from family members revealed that TRUJILLO continued to drive east past Gallup, NM and towards Albuquerque, NM. That is, after his license plate was identified in Maricopa, AZ, TRUJILLO continued through Gallup, the location of VICITMS, and on to Albuquerque.

16. On or about January 12, 2024, investigators learned that TRUJILLO contacted L.R., year of birth 1974 (hereinafter referred to as WITNESS 2). WITNESS 2 is another family member of TRUJILLO. Through sources, law enforcement learned that TRUJILLO told WITNESS 2 he was going to get rid of his phone and he did not care if he went to jail. TRUJILLO reportedly told WITNESS 2 that he kept his phone on airplane mode and instructed WITNESS 2 to not tell people they spoke to each other.

17. On or about January 12, 2024, investigators also learned that TRUJILLO told WITNESS 2 a couple days ago that he carried a firearm.

18. As of this writing, law enforcement believe TRUJILLO remains in the Albuquerque area and poses a threat to VICTIMS.

19. Based on my training and experience, as well as the totality of the evidence, I have probable cause to believe that the text message sent by TRUJILLO to VICTIMS was intended by TRUJILLO to be a threat to VICTIMS. In addition to the pending arson investigation, the fact that TRUJILLO drove to NM following this threat and made additional statements indicating his intent to harm VICTIM 1 further supports the conclusion that the text was intended by TRUJILLO as a threat against VICTIMS.

20. Further, based on the investigation, I have probable cause to believe TRUJILLO sent the text message communication from CA to the VICTIMS in Gallup, NM, therefore the

threat was transmitted in interstate commerce. Even if TRUJILLO was not in CA at the time he sent the text, probable cause remains that the text was sent in interstate commerce because it was sent through TRUJILLO's phone service provider, currently understood to be Verizon or T-Mobile, based on open-source information, both of which are headquartered in New Jersey and route texts through their cellular networks.

CONCLUSION

21. Based on the information set forth in this affidavit, I believe there is probable cause to charge TRUJILLO with a violation of 18 U.S.C. § 875(c) – Interstate Communications.
22. Assistant United States Attorney Sarah Mease has reviewed and approved this affidavit.

I swear that this information is true and correct to the best of my knowledge.



James Ridder
Special Agent
Federal Bureau of Investigation

Subscribed electronically and sworn to me
this 13 day of January, 2024.



Kirtan Khalsa
HONORABLE KIRTAN KHALSA
UNITED STATES MAGISTRATE JUDGE